

BRUCE LOCKE (#177787)
Moss & Locke
555 University Avenue, Suite 170
Sacramento, CA 95825
(916) 569-0667
(916) 569-0665 fax
Attorneys for
JESUS RODRIGUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-00387-MCE
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
)	STATUS CONFERENCE FROM
v.)	AUGUST 16, 2007 TO SEPTEMBER 6,
)	2007 AT 9:00 A.M. AND EXCLUDE
JESUS RODRIGUEZ,)	TIME UNDER SPEEDY TRIAL ACT
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED between the defendant, Jesus Rodriguez, and the United States of America, through defense counsel, Bruce Locke and Assistant U.S. Attorney Phillip Talbert, that the Status Conference set for August 16, 2007 should be continued to September 6, 2007 at 9:00 a.m. The reason for the continuance is that the defense has learned that the government has two witnesses who will testify that they purchased drugs from the defendant prior to the time of the first sale identified in the indictment and this information materially affects the defense of entrapment. The defense must review all of the discovery relating to these two witnesses and needs additional time to complete that review. The defense expects to receive the remaining discovery this week or early next week and will need approximately three weeks to review these materials. The parties agree that the time between August 16, 2007 and September 6, 2007 should be excluded from the Speedy Trial computation for the reason that the additional time is needed for defense preparation. Mr. Talbert has authorized the undersigned to sign this Stipulation and Order for him.

///

1 DATED: August 14, 2007


/S/
BRUCE LOCKE
Attorney for Mr. Jesus Rodriguez

6 DATED: August 14, 2007

/S/ BRUCE LOCKE
for PHILLIP TALBERT
Assistant U.S. Attorney

10 IT IS SO ORDERED.

12 Dated: August 15, 2007


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE